

FILED
 U.S. DISTRICT COURT
 EASTERN DISTRICT ARKANSAS
 OCT 06 2020
 JAMES W. MCCORMACK, CLERK
 By: *Tammie Oh*
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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS
CENTRAL DIVISION

UNITED STATES OF AMERICA)	No. 4:20CR 00288 DPM
)	
V.)	18 U.S.C. § 371
)	18 U.S.C. § 844(f)(1)
MUJERA BENJAMIN LUNGAHO)	18 U.S.C. § 924(c)(1)(B)

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE

THE CONSPIRACY AND ITS OBJECTS

From in or about August 2020, and continuing through September 3, 2020, in the Eastern District of Arkansas and elsewhere, the defendant,

MUJERA BENJAMIN LUNGAHO,

did knowingly conspire and agree with other persons, known and unknown to the Grand Jury, to commit an offense against the United States, that offense being the Malicious Destruction or Damage by Fire of a Vehicle of an Organization Receiving Federal Financial Assistance, in violation of Title 18, United States Code, Section 844(f)(1).

MANNER AND MEANS OF THE CONSPIRACY

It was part of the conspiracy that, in or about August and September 2020, the defendant, MUJERA BENJAMIN LUNGAHO, and other persons unknown to the Grand Jury, conspired and agreed to use fire to damage and destroy a police vehicle known as Unit 1801, which vehicle was owned and possessed by the City of North Little Rock Police Department, an organization receiving Federal financial assistance.

OVERT ACTS

On or about September 3, 2020, in furtherance of the conspiracy and in order to achieve the objects of the conspiracy, defendant, MUJERA BENJAMIN LUNGAHO, and other persons unknown to the grand jury, committed the following overt acts:

1. A person unknown to the Grand Jury cut the chain-link fence at the North Little Rock Police Department Rose City Substation located at 4609 East Broadway in North Little Rock, Arkansas.
2. A person unknown to the Grand Jury broke the window of Unit 1801.
3. A person unknown to the Grand Jury ignited a Molotov cocktail-type improvised incendiary device inside Unit 1801.

All in violation of Title 18, United States Code, Section 371

COUNT TWO

On or about September 3, 2020, in the Eastern District of Arkansas, the defendant,
MUJERA BENJAMIN LUNGAHO,
and other persons unknown to the grand jury, maliciously damaged and destroyed, and caused to be damaged and destroyed, by means of fire, and maliciously attempted to damage and destroy by means of fire, a vehicle, namely, a police vehicle known as Unit 1801, which vehicle was owned and possessed by the City of North Little Rock, an organization receiving federal financial assistance.

All in violation of Title 18, United States Code, Sections 2 and 844(f)(1).

COUNT THREE

On or about September 3, 2020, in the Eastern District of Arkansas, the defendant,
MUJERO BENJAMIN LUNGAHO,
did knowingly carry and use a firearm, that is, a Molotov cocktail-type improvised incendiary

device, during and in relation to, a crime of violence for which he may be prosecuted in a court of the United States, that is a violation of Title 18, United States Code, Section 844(f)(1) as charged in Count Two of this Indictment.

All in violation of Title 18, United States Code, Section 924(c)(1)(B).

[END OF TEXT. SIGNATURE PAGE ATTACHED.]